

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ENVY BRANDING, LLC,	:	
	:	Case No. 20-cv-3182 (PGG)
Plaintiff,	:	
	:	
- against -	:	
	:	
THE WILLIAM GERARD GROUP, LLC, et al	:	
	:	
Defendants.	:	
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PLAINTIFF’S DECLARATION IDENTIFYING CITIZENSHIP OF EACH PARTY

By and through its undersigned counsel, Plaintiff Envy Branding LLC (“Plaintiff” or “Envy”) hereby submits this Declaration identifying the names and citizenships of each party, pursuant to the Court’s Order, dated April 7, 2023 (ECF No. 75), and states as follows:

1. Plaintiff initiated the instant action in the Supreme Court of the State of New York, County of New York, on March 5, 2020.
2. On April 22, 2020, Defendants removed the instant action to federal court, based upon diversity of citizenship pursuant to 28 U.S.C. §1331.
3. Plaintiff is a limited liability company organized under the laws of New York. Its member, Sara Nemerov, is a citizen of New York.
4. Upon information and belief, based on Defendants’ representations, Defendant The William Gerard Group LLC (“TWGG”) is a limited liability company organized under Pennsylvania law with its principal place of business in Pittsburgh, Pennsylvania.
5. Upon information and belief, based on Defendants’ representations, Defendant William Dzombak is a member of TWGG, and is a resident and citizen of Pennsylvania.

6. Upon information and belief, based on Defendants' representations, Defendant C&A Enterprises LLC is a limited liability company formed under the laws of South Dakota. Its member, Chelsea DeBoer is a resident and citizen of South Dakota. It is Plaintiff's understanding, through Defendants' representation, that this entity is no longer in business.

7. Upon information and belief, based on Defendants' representations, Defendant DeBoer Holding Company LLC is a limited liability company formed under the laws of South Dakota. Defendants Chelsea DeBoer and Cole DeBoer are members of DeBoer Holding Company LLC and are residents and citizens of South Dakota.

8. Upon information and belief, based on the testimony of Defendants, Defendant Aubree Says LLC is a limited liability company formed under the laws of Delaware. Defendants William Dzombak, a resident and citizen of Pennsylvania, and CCAS Holding LLC are the members of Aubree Says LLC. The members of CCAS Holding LLC, a limited liability company formed under the laws of South Dakota, are Chelsea DeBoer and Cole DeBoer, who are residents and citizens of South Dakota.

9. Upon information and belief, based on Defendants' representations, Defendant Down Home DeBoers LLC is a limited liability company formed under the laws of South Dakota. Defendants Chelsea DeBoer and Cole DeBoer are members of Down Home DeBoers LLC and are residents and citizens of South Dakota.

10. Upon information and belief, based on Defendants' representations, Defendant Dakota Ln LLC is a limited liability company formed under the laws of South Dakota. Defendants Chelsea DeBoer and Cole DeBoer are members of Dakota Ln LLC and are residents and citizens

of South Dakota.

Dated: April 10, 2023

KLEHR HARRISON HARVEY
BRANZBURG LLP

/s/ Matthew J. McDonald

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CERTIFICATE OF SERVICE

I, Matthew J. McDonald, Esquire, hereby certify that I caused a true and correct copy of the foregoing document to be served on all parties of record via ECF.

Dated: April 10, 2023

/s/ Matthew J. McDonald
Matthew J. McDonald